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UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

v.

[REDACTED] and
TERRY WAYNE MOORE,
Defendants.

2:25-CR-57-MKD-2

INDICTMENT

Vio.: 21 U.S.C. §§ 841(a)(1),
(b)(1)(A)(viii), 846,
Conspiracy to Distribute 50
Grams or More of Actual
(Pure) Methamphetamine
(Count 1)

21 U.S.C. § 841(a)(1),
(b)(1)(B)(viii)
Distribution of 5 Grams or
More of Actual (Pure)
Methamphetamine
(Counts 2-4)

21 U.S.C. § 853
Forfeiture Allegations

The Grand Jury charges:

COUNT 1

Beginning on a date unknown, but by on or about November 2024, and
continuing to April 2025, in the Eastern District of Washington, the Defendants,
[REDACTED] and TERRY WAYNE MOORE, and other

1 individuals both known and unknown to the Grand Jury, did knowingly and
2 intentionally combine, conspire, confederate and agree together with each other to
3 commit the following offense: distribution of 50 grams or more of actual (pure)
4 methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. §§
5 841(a)(1), (b)(1)(A)(viii), all in violation of 21 U.S.C. § 846.

6 COUNT 2

7 On or about November 27, 2024, in the Eastern District of Washington, the
8 Defendant, [REDACTED], did knowingly distribute 5 grams or
9 more of actual (pure) methamphetamine, a Schedule II controlled substance, in
10 violation of 21 U.S.C. § 841(a)(1), (b)(1)(B)(viii).

11 COUNT 3

12 On or about December 10, 2024, in the Eastern District of Washington, the
13 Defendant, [REDACTED], did knowingly distribute 5 grams or
14 more of actual (pure) methamphetamine, a Schedule II controlled substance, in
15 violation of 21 U.S.C. § 841(a)(1), (b)(1)(B)(viii).

16 COUNT 4

17 On or about February 13, 2025, in the Eastern District of Washington, the
18 Defendants, [REDACTED] and TERRY WAYNE MOORE, did
19 knowingly distribute 5 grams or more of actual (pure) methamphetamine, a
20 Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1),
21 (b)(1)(B)(viii) and 18 U.S.C. § 2.

1 NOTICE OF CRIMINAL FORFEITURE ALLEGATIONS

2 The allegations set forth in this Indictment are hereby realleged and
3 incorporated by reference for the purpose of alleging forfeiture.4 Pursuant to 21 U.S.C. § 853, upon conviction of an offense(s) in violation of
5 21 U.S.C. § 841, as set forth in this Indictment, the Defendants, [REDACTED]6 [REDACTED] and TERRY WAYNE MOORE, shall forfeit to the United States of
7 America, any property constituting, or derived from, any proceeds obtained, directly or
8 indirectly, as the result of such offense(s) and any property used or intended to be used,
9 in any manner or part, to commit or to facilitate the commission of the offense(s).10 If any forfeitable property described above, as a result of any act or omission of
11 the Defendants:12 a. cannot be located upon the exercise of due diligence;
13 b. has been transferred or sold to, or deposited with, a third party;
14 c. has been placed beyond the jurisdiction of the court;
15 d. has been substantially diminished in value; or
16 e. has been commingled with other property which cannot be divided
17 without difficulty,
18 ///
19 ///
20 ///
21 ///

1 the United States of America shall be entitled to forfeiture of substitute property
2 pursuant to 21 U.S.C. § 853(p).

3

4 DATED this _____ day of April 2025.

5 A TRUE BILL

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7 _____
Foreperson

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9 Richard R. Barker
Acting United States Attorney

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11 _____
12 Rebecca R. Perez
Assistant United States Attorney

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INDICTMENT – 4